

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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CHERYL SAGATAW and  
DEANTHONY BARNES, *on behalf of  
themselves and a class of  
similarly-situated individuals,*

Plaintiffs,

vs.

MAYOR JACOB FREY, *in his  
individual and official capacity,*

Defendant.

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Civil Action No.  
0:24-cv-00001-ECT/TNL

**DECLARATION OF CHERYL  
SAGATAW IN SUPPORT OF  
COMPLAINT AND MOTION  
FOR TEMPORARY  
RESTRAINING ORDER**

**DECLARATION OF CHERYL SAGATAW**

I, Cheryl Sagataw, pursuant to 28 U.S.C. § 1746, declare as follows:

1. My name is Cheryl Sagataw and I am 32 years old.
2. I am enrolled Potawatomi, from Hannahville Reservation in the Upper Peninsula, Michigan.
3. I have a high school diploma from Nah Tah Wash Public School and attended college at Bayde Noc. I have ten years' experience working in the food and beverage industry.
4. I live with post-traumatic stress disorder (PTSD) as a result of extreme domestic abuse from a prior relationship that almost cost me my life. This prior trauma and abuse is part of why I have stayed at Camp Nenookaasi—it has been a safe place for me away from my abuser.
5. Until recently, I was living in public housing at Anishinaabe, but I lost my housing in March 2023 due to unreasonable housing policies and circumstances.
6. After that, I was living under interstate 94 for some time, but kept getting kicked out. I then moved to the Wall of Forgotten Natives, but also got kicked out there. Then I heard that Camp Nenookaasi was a safe place to stay and moved here around late August/early September 2023.
7. Camp Nenookaasi is an Indigenous-led healing camp. It is a close community. Everyone is here to help and support each other. People here treat each other like family, that's why I like it so much.
8. Being at Camp Nenookaasi feels similar to being on the Rez. Even though we are all from different Reservations and from different Tribes, we all understand each other, we share a culture, we share ways of speaking and being with each other. It's really special, because even though we are all from different places, it's like we've come together here at Camp Nenookaasi to make our own Tribe.
9. Residents of Camp Nenookaasi include Potawatomi (from Hannahville and Forest County), Ojibwe (from Red Lake, White Earth, Leech Lake), and Sioux (from North and South Dakota). They say that Ojibwe and Sioux people don't get along, but Camp Nenookaasi shows that isn't true. Everyone co-exists here together.
10. There are around 180 residents here currently. Although some people have been able to get housing, there are still many of us trying to get into permanent housing, including myself.

11. Native religious and ceremonial practices are part of life here at Camp Nenookaasi.  
Before coming to Camp Nenookaasi, I did not often practice parts of my culture because I was afraid of doing it the wrong way. But Camp Nenookaasi has been a place for me to observe and learn, and the people here have opened my eyes to how important it is to keep the culture alive. The older I get, the more I've learned that there's no wrong or right way to do it. Religion and spirituality are often treated as two different things, but really it's all about how you feel in your spirit and in your heart.
12. The ceremonies I have participated in here have been very powerful. I attended a pipe ceremony after Sam, a resident who was one of the original Sun Dancers, passed away. That was a profound experience. The Camp also has hosted sweat lodges and a naming ceremony. Currently, we are doing a four-day ceremony for Tebone, the resident who passed away this week. This ceremony is very detailed and critically important to help his spirit cross into the spirit world across the lake. This practice is a necessary religious practice for us.
13. I feel like I am meant to be here at the Camp. I have had spiritual dreams, and just yesterday I found an Eagle feather on the ground. These things feel too important to be coincidental. Being at the Camp has been a profoundly spiritual experience for me, and there is no other place I've ever been that has had this spiritual impact on me.
14. To put it simply, Camp Nenookaasi feels like home.
15. The stability of Camp Nenookaasi has helped me so much. Nicole herself talks about her sobriety openly, and she inspires me—she shows us that if she can do it, why can't we? When you're on the streets, your stuff gets stolen frequently and you often lose basic stability and even basic life skills. Living here, with the mentorship and leadership of Nicole, has brought that back for me.
16. I've seen folks at the Camp who have never learned life skills, but they are learning by living here. I'm still learning too.
17. Living at Camp Nenookaasi has also helped me to get signed up for treatment and housing. I'm currently on a list to get a bed at RS Eden. But in the meantime, Nicole and others at Camp Nenookaasi hold sobriety meetings that have really helped me. The fact that people here are organizing meetings while we wait to get into treatment and housing matters so much. Just the fact that people care about me matters so much.
18. When I heard about the eviction notice, I thought it was so foolish. Because people have to be somewhere, and evicting and destroying Camp Nenookaasi does nothing to help and only further harms Native peoples on our own land.

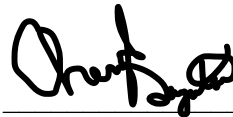
19. If Camp Nenookaasi is destroyed, I will still do my best to get into treatment and stay connected to the community we've built here. But it will be so much harder. I don't know where I will go or where I will live. I don't know where my belongings will end up. I won't be able to carry all of my belongings, so most of my things will be destroyed. Everything will become so much harder, and the destruction of this Camp will be deeply traumatic to me and every other resident here. If I'm not here, I don't know how RS Eden will contact me to let me know that a bed is available. I'm worried that I will lose my spot and not get into treatment if Camp Nenookaasi is destroyed.
20. I've been kicked out of encampments so many times that I've lost track of the number. Being kicked out is so difficult. You lose everything you have and have to start all over from the beginning. Sometimes you're able to grab some of your things and try to save them, but sometimes you don't have time. Sometimes you're able to take some of your stuff, but other times it gets left, destroyed, or stolen. It really undermines your trust in people. There have been times I've traded food to be able to use someone's cart to transport my stuff and save some of my belongings, but in that situation you then go without food. Getting evicted makes you feel hopeless.
21. As humans, we are social beings. To be social you have to have trust. But when you're experiencing these things, it makes it hard to trust people. Here at Camp Nenookaasi, though, I've been able to slowly build back my trust in people and this community.
22. At Camp Nenookaasi, I stay in a tent, but I'm able to go to a yurt with a wood stove in order to get warm. If the Camp gets evicted, I don't know how I'll be able to keep warm. I can't afford a hotel or a place to stay or a car now, though I've been saving and working towards those goals. Until we got to Camp Nenookaasi I didn't think that would even be possible.
23. In prior evictions, my boyfriend and I have lost tribal cards, his social security card, and my birth certificate. These documents are so difficult to replace, and take a lot of time. And often to get one form of identification, you need another form of identification. When I lost these things, I feel like I'm looked at as being irresponsible. But the reason I lost these things is because my boyfriend and I were at a necessary medical appointment during the eviction and it was totally out of our control.
24. Law enforcement does the evictions, meaning that if you don't comply or refuse to leave, you are arrested, put in jail, criminally charged. Criminal charges could ruin my life, and cause a horrible spiral. It's something I cannot risk, so I have to comply when I'm evicted.
25. There are women in this Camp who I know that being here has saved them from having sex for money or drugs. Camp Nenookaasi has kept them safe from all that. But if Camp Nenookaasi is destroyed, those women will go back to that life, because there won't be

other options for them. And the reality is, there is an epidemic of Missing and Murdered Indigenous Women. I know five people myself who are missing, and no one seems to care. I'm afraid that this eviction will only cause more women to be stolen, sex-trafficked, and murdered.

26. Camp Nenookaasi is a space supported by community—we have what we have because of friends, friends of friends, neighbors. Camp Nenookaasi shows that even when the government won't help us, we can help ourselves. All we are asking is that the government doesn't destroy what we are building to help ourselves and support each other and our Native relatives. We are asking the government not to continue this genocide of our people, as we do our best to survive and heal.
27. I feel nervous about saying all of this. But at the end of the day, if I don't say something, I know we will continue to be pushed down in the shadows and treated like we don't exist. My mom used to tell me, if you've got something to say, say it, and don't be afraid to say it twice. Well, I am saying this now. I want people to know about us. I want the world to know that we are still here. Genocide isn't just in history books, we are living genocide right now. And that's not an exaggeration, that's how it really is. This is my ancestors' land, where my ancestors would hunt and migrate, and the government won't even let us stay in an empty lot just to live.

I declare under penalty of perjury that this declaration is true and correct.

Executed on December 15, 2023, in the City of Minneapolis, County of Hennepin, State of Minnesota, Treaty-Ceded Territory of the Dakota peoples.

A handwritten signature in black ink, appearing to read 'Cheryl Sagataw', written over a horizontal line.

Cheryl Sagataw